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10 *Counsel for the Post-Confirmation Oversight Committee,*  
11 *as successor-in-interest to the Official Committee of Unsecured Creditors*

12 **UNITED STATES BANKRUPTCY COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14 **SANTA ANA DIVISION**

15 In re:

16 THE LITIGATION PRACTICE GROUP,  
17 P.C.,

18 Debtor.

Case No. 8:23-bk-10571-SC  
Chapter 11

**JOINDER TO TRUSTEE'S REPLY IN  
SUPPORT OF FINAL APPLICATIONS  
FOR ALLOWANCE OF FEES AND COSTS**

Hearing Date & Time

Date: January 14, 2025

Time: 10:00 a.m.

Judge: Hon. Scott C. Clarkson

Ctrm: 5C – Via Zoom

Place: 411 West Fourth Street  
Santa Ana, CA 92701

Fox Rothschild LLP (“Fox”), in its capacity as former counsel to the Official Committee of Unsecured Creditors, and current counsel to its successor-in-interest, the Post-Confirmation Oversight Committee (the “Committee”), in the above-captioned bankruptcy case (the “Bankruptcy Case”) of The Litigation Practice Group, P.C. (the “Debtor”) filed under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”),<sup>1</sup>, hereby files this joinder (the “Joinder”) to the *Trustee’s Reply in Support of Final Applications For Allowance of Fees and Costs; and Request For Judicial Notice in Support* [Docket No. 2011] (the “Reply”) filed by Richard A. Marshack, in his capacity as chapter 11 trustee in the Bankruptcy Case (the “Trustee”). The Committee files this Joinder: (i) in support of *Fox Rothschild LLP’s Second and Final Application for Compensation and Reimbursement of Expenses* [Docket No. 1897] (the “Application”);<sup>2</sup> and (ii) in response to the objection [Docket No. 1972] and related addendum [Docket No. 1992] (collectively, the “Objection”) filed by Greyson Law Center, PC, Han Trinh, and Jayde Trinh (collectively, the “Objecting Parties”). In support of this Joinder, the Committee respectfully states as follows:

I.

**JOINDER**

The Objection raises a narrow issue—one already finally resolved by the Court—as to all professionals that filed final fee applications. In the interest of conserving estate and trust resources, the professionals have taken a collaborative and joint approach to the Objection in lieu of duplicative reply briefs. Based on the foregoing, the Committee hereby joins in the arguments set forth by the Trustee in the Reply to the Objection, with respect to the Objecting Parties’ objections to the Application, and incorporates the arguments set forth in the Objection herein in full by this reference.

The Reply correctly notes that the only arguments set forth in the Objection pertain to administrative claim reserves—an issue addressed through the confirmation process and now subject to a final order that the Objecting Parties did not appeal. The Objecting Parties’ myopic attempt to collaterally attack the confirmation order lays bare a key concession: ***the Objecting Parties concede***

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<sup>1</sup> Unless otherwise noted, all references to “Section” or “§” refer to a section of the Bankruptcy Code.

<sup>2</sup> Unless otherwise defined herein, all capitalized terms have the definitions set forth in the Application.

1 *(by failing to contest) that the Application seeks reasonable compensation for actual and necessary*  
2 *services rendered and actual and necessary expenses of Fox.* The Objection offers no criticism of  
3 the fees and expenses sought by Fox in the Application. Indeed, Fox and the Application are  
4 mentioned only in passing in a chart purporting to summarize all fee requests. Accordingly, to the  
5 extent the Objection is overruled for the reasons set forth in the Reply, the Application should be  
6 approved in its entirety and the Court should not entertain further or alternative objections to the  
7 Application from the Objecting Parties.

8 **II.**

9 **CONCLUSION**

10 For the foregoing reasons, Fox respectfully requests that the Court enter an order (i) approving  
11 the Application in its entirety; (ii) overruling the Objection; (iii) allowing, on a final basis,  
12 (a) compensation for professional services rendered to the Committee from June 29, 2023, through  
13 and including September 23, 2024, in the amount of \$1,056,669, and (b) reimbursement of expenses  
14 incurred in connection with such services in the amount of \$19,939.22; (iv) authorizing and directing  
15 payment to be made to Fox in the amount of \$224,912.85 in fees and \$2,517.60 in expenses, which  
16 represent the fees and expenses for the Second Interim Period plus the Holdback; and (v) granting  
17 Fox such other and further relief as the Court may deem just and proper.

18  
19 **FOX ROTHSCHILD LLP**

20 By: /s/ Nicholas A. Koffroth  
21 Keith C. Owens (Bar No. 184841)  
Nicholas A. Koffroth (Bar No. 287854)

22 *Counsel for the Post-Confirmation Oversight*  
23 *Committee, as successor-in-interest to the*  
24 *Official Committee of Unsecured Creditors*  
25  
26  
27  
28

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

A true and correct copy of the foregoing documents entitled: JOINDER TO TRUSTEE'S REPLY IN SUPPORT OF FINAL APPLICATIONS FOR ALLOWANCE OF FEES AND COSTS on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 1/07/2025, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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- **Johnny White** JWhite@wrslawyers.com, jlee@wrslawyers.com
- **Reina Zepeda** rzepeda@omniagnt.com

**2. SERVED BY UNITED STATES MAIL:** On 1/07/2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows.

**See attached for additional parties**

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on 1/07/2025, I served the following persons and/or entities by personal delivery, mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Scott C. Clarkson  
United States Bankruptcy Court, Central District of California  
411 West Fourth Street, Suite 5130 / Courtroom 5C  
Santa Ana, CA 92701-4593

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

1/07/2025

Kimberly Hoang

/s/ Kimberly Hoang

Date

Printed Name

Signature

**Additional Parties Served by U.S. Mail**

**Creditors who have the 20 largest unsecured claims**

Debt Validation Fund II, LLC  
5075 Lower Valley Road,  
Atglen, PA 19310

MC DVI Fund 1, LLC; MC  
DVI Fund 2, LLC  
598 Cottonwood Dr.,  
Glenview, IL 60026

Validation Partners LLC  
1300 Sawgrass Pkwy, Ste. 110  
Sunrise, FL 33323

Marich Bein LLC  
99 Wall Street, Ste 2669  
New York, NY 10005

Business Centers of America  
1100 Sir Francis Drake Blvd,  
Ste 1, Kentfield, CA 94904

JP Morgan Chase  
3 Park Plaza, Ste 900  
Irvine, CA 92614

CA Franchise Tax Board  
PO Box 942857  
Sacramento, CA 94257-0511

Outsource Accelerator Ltd  
City Marque Limited  
Unit 8801-2 Bldg. 244-248  
Des Voeux Rd.  
Central Hong Kong

Collaboration Advisors  
400 Dorla Court  
Zephyr Cove, NV 89448

Anthem Blue Cross  
PO Box 511300  
Los Angeles, CA 90051-7855

1 Azevedo Solutions Groups, Inc.  
2 420 Adobe Canyon Rd.  
3 Kenwood, CA 95452

4 Debt Pay Pro  
5 1900 E Golf Road, Suite 550  
6 Schaumburg, IL 60173

7 Sharp Business Systems  
8 8670 Argent St  
9 Santee, CA 92071

10 Tustin Executive Center  
11 1630 S Sunkist Steet, Ste A  
12 Anaheim, CA 92806

13 Exela Enterprise Solutions  
14 2701 E. Grauwlyer Road  
15 Irving, TX 75061

16 Netsuite-Oracle  
17 2300 Oracle Way  
18 Austin, TX 78741

19 Credit Reporting Service Inc  
20 548 Market St, Suite 72907  
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services  
23 2930 Ramona Ave #100  
24 Sacramento, CA 95826

25 Executive Center LLC  
26 5960 South Jones Blvd  
27 Las Vegas, NV 89118

28 LexisNexus  
15500 B Rockfield Blvd  
Irvine, CA 92618

**Secured Creditors**

Diverse Capital LLC  
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Sunny Isles, FL 33154

City Capital NY  
1135 Kane Concourse  
Bay Harbour Islands, FL 33154